

1 Honorable Barbara J. Rothstein  
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UNITED STAETS DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

10 JASON FUHR, Individually, and as Executor of  
11 the Estate of SHAUN FUHR, DAVONTA  
12 TANIYA FUHR, individually.

13 Plaintiff,  
14 vs.  
15 CITY OF SEATTLE, and NOAH ZECH,  
16 Defendants.

No. 2:23-cv-00600- BJR

**STIPULATED MOTION TO AMEND  
PLAINTIFF'S COMPLAINT AND  
ORDER<sup>1</sup>**

16 IT IS HEREBY STIPULATED by and between Plaintiffs, JASON FUHR, individually and as  
17 the executor of the Estate of SHAUN FURH, and DAVONTA TANIYA FURH, individually, through  
18 their attorney, Jesse Valdez, and Defendants, CITY OF SEATTLE AND NOAH ZECH, through their  
19 attorneys of record, that leave should be granted to allow Plaintiff leave to file a First Amended Complaint  
20 pursuant to Rule 15(a) of the Federal Rules of Civil Procedure.  
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22 1. Plaintiffs filed their complaint on April 20, 2023.  
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25 <sup>1</sup>Counsel filed the “Motion to Amend,” incorrectly, as an “Amended Complaint,” rather than as a motion. Accordingly, the  
26 Motion was never placed on the Court’s calendar, and was not brought to the Court’s attention until counsel emailed  
chambers a copy of the proposed order on February 1, 2024.

27 Stipulation and Order to File First  
28 Amended Complaint for  
Plaintiffs Jason Fuhr, et. al.

VALDEZ LEHMAN, PLLC  
14205 SE 36<sup>th</sup> St. Ste 100  
Bellevue, WA 98006  
P: 425.458.4415

1           2. Plaintiffs' First Amended Complaint adds Davonta Taniya Fuhr as a party, and the causes of  
2           action are otherwise materially unchanged.  
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5           NOW THEREFORE, the Plaintiffs request that the Court grant leave to file a First Amended  
6           Complaint in this action, a true and correct copy of which is attached as Exhibit A hereto.  
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8           IT IS SO STIPULATED.  
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10           DATED this 3<sup>rd</sup> day of August 2023.  
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13           By /s/ Jesse Valdez  
14           Jesse Valdez, WSBA #35378  
15           VALDEZ LEHMAN, PLLC.  
16           Co-Counsel and Attorney for Plaintiff  
17           Jason Fuhr, et. al.  
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19           DATED this 3<sup>rd</sup> of August 2023.  
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22           Agreed to by: /s/ Brandon Rain  
23           Brandon Rain, WSBA# 45247  
24           Rebecca Widen, WSBA# 57339  
25           Seattle City Attorney's Office  
26           701 Fifth Avenue, Suite 2050  
27           Seattle, WA 98104  
28           Attorneys for Defendants

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32           **ORDER**  
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35           Good cause appearing, and there being no objection, it is hereby ordered that Plaintiff is  
36           granted leave to file the First Amended Complaint, which is attached hereto as Exhibit A.  
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39           Stipulation and Order to File First  
40           Amended Complaint for  
41           Plaintiffs Jason Fuhr, et. al.

42           **VALDEZ LEHMAN, PLLC**  
43           14205 SE 36<sup>th</sup> St. Ste 100  
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1  
2 Dated this February 1, 2024.

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Barbara Jacobs Rothstein

Barbara Jacobs Rothstein  
U.S. District Court Judge

Stipulation and Order to File First  
Amended Complaint for  
Plaintiffs Jason Fuhr, et. al.

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